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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.3.13.02 [Index Number 459]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.13.02 [Index Number 459]. This ITAAC verifies that the Primary Sampling System (PSS) components listed in the Combined License (COL) Appendix C, Table 2.3.13-1, that are identified as American Society of Mechanical Engineers Code Section III, were designed and constructed in accordance with applicable requirements. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52, which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

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Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.3.13.02 [Index Number 459]

JMC/TL/sfr

cc: Regional Administrator, Region ll
Director, Office of Nuclear Reactor Regulation (NRR)
Director, Vogtle Project Office NRR
Senior Resident Inspector – Vogtle 3 & 4

Southern Nuclear Operating Company
ND-23-0170
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.3.13.02 [Index Number 459]

ITAAC Statement

Design Commitment:

2.The components identified in Table 2.3.13-1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.

3. Pressure boundary welds in components identified in Table 2.3.13-1 as ASME Code Section III meet ASME Code Section III requirements.

4. The components identified in Table 2.3.13-1 as ASME Code Section III retain their pressure boundary integrity at their design pressure.

Inspections, Tests, Analyses:

Inspection will be conducted of the as-built components as documented in the ASME design reports.

Inspection of the as-built pressure boundary welds will be performed in accordance with the ASME Code Section III.

A hydrostatic test will be performed on the components required by the ASME Code Section III to be hydrostatically tested.

Acceptance Criteria:

The ASME Code Section III design reports exist for the as-built components identified in Table 2.3.13-1 as ASME Code Section III.

A report exists and concludes that the ASME Code Section III requirements are met for non-destructive examination of pressure boundary welds.

A report exists and concludes that the results of the hydrostatic test of the components identified in Table 2.3.13-1 as ASME Code Section III conform with the requirements of the ASME Code Section III.

ITAAC Determination Basis

This ITAAC requires inspections, tests, and analyses be performed and documented to ensure the Primary Sampling System (PSS) components listed in the Combined License (COL) Appendix C, Table 2.3.13-1 (Attachment A) that are identified as American Society of Mechanical Engineers (ASME) Code Section III are designed and constructed in accordance with applicable requirements.

2. The ASME Code Section III design reports exist for the as-built components identified in Table 2.3.13-1 as ASME Code Section III.

Each component listed in Table 2.3.13-1 as ASME Code Section Ill was fabricated in accordance with the VEGP Updated Final Safety Analysis Report (UFSAR) and the ASME Code Section III requirements. The ASME Code Section III certified Design Reports for these components exist and document that the as-built components conform to the approved design details. The ASME Section III Design Report for each component is documented in the component's completed ASME Section III Code Data Report. The individual component ASME Section III Code Data Reports are documented on the ASME Section III N-5 Code Data Report(s) for the applicable piping system (Reference 1).

The as-built components listed in Table 2.3.13-1 as ASME Code Section III, were subjected to a reconciliation process (Reference 2), which verifies that the as-built components are analyzed for applicable loads (e.g., stress reports) and for compliance with all design specification and Code provisions. Design reconciliation of the as-built systems, including installed components, validates that construction completion, including field changes and any nonconforming condition dispositions, is consistent with and bounded by the approved design. All applicable fabrication, installation and testing records, as well as those for the related Quality Assurance (QA) verification/inspection activities, which confirm adequate construction in compliance with the ASME Code Section III and design provisions, are referenced in the N-5 data report and/or its sub-tier references.

The applicable ASME Section III N-5 Code Data Report(s), which include the location of the certified Design Reports for all the components listed in Table 2.3.13-1 (Attachment A) as ASME Code Section III, exist and conclude that these installed components are designed and constructed (including their installation within the applicable as-built piping system) in accordance with the ASME Code Section III (1998 Edition, 2000 Addenda) requirements. The N-5 Code Data Reports for the components listed in the Table 2.3.13-1 are identified in Attachment A.

3. A report exists and concludes that the ASME Code Section III requirements are met for non-destructive examination of pressure boundary welds.

Inspections were performed in accordance with ASME Code Section III (1998 Edition, 2000 Addenda) to demonstrate that as-built pressure boundary welds in components identified in Table 2.3.13-1 as ASME Code Section III meet ASME Code Section III requirements (i.e., no unacceptable indications).

The applicable non-destructive examination (including liquid penetrant, magnetic particle, radiographic, and ultrasonic testing, as required by ASME Code Section III) of the components' pressure boundary welds are documented in the Non-destructive Examination Report(s) within the supporting component's data package, which support completion of the respective ASME Section III N-5 Code Data Report(s) certified by the Authorized Nuclear Inspector, as listed in Attachment A.

Per ASME Code Section III, Subarticle NCA-8300, "Code Symbol Stamps," the N-5 Code Data Report(s) (Reference 1) document satisfactory completion of the required examination and testing of the item, which includes non-destructive examinations of pressure boundary welds. Satisfactory completion of the non-destructive examination of pressure boundary welds ensures that the pressure boundary welds in components identified in Table 2.3.13-1 as ASME Code Section III, meet ASME Code Section III requirements.

4. A report exists and concludes that the results of the hydrostatic test of the components identified in Table 2.3.13-1 as ASME Code Section III conform with the requirements of the ASME Code Section III.

A hydrostatic test was performed by the vendor to demonstrate that the components identified in Table 2.3.13-1 (Attachment A) as ASME Code Section III retain their pressure boundary integrity at their design pressure. The completion of the N-5 Data Reports is governed by Reference 2.

This ITAAC has been completed, as each component identified in Table 2.3.13-1 has their individual Code Symbol N-Stamp and corresponding Code Data Report (Reference 1) completed, and the components were installed into the respective Code Symbol N-Stamped piping system and documented on the corresponding N-5 Code Data Report(s) (Reference 1). The hydrostatic testing results of the component's pressure boundary are documented in the Hydrostatic Testing Report(s) within the supporting component's data package, which support completion of the respective Code Stamping and Code Data Report(s).

The completion of stamping the individual components and the respective piping system along with the corresponding ASME Code Data Reports (certified by the Authorized Nuclear Inspector) ensures that the components are constructed in accordance with the Design Specifications and the ASME Code Section III and that the satisfactory completion of the hydrostatic pressure testing of each component identified in Table 2.3.13-1 as ASME Code Section III are documented in the Hydrostatic Testing Report(s) within the supporting data packages and meets ASME Code Section III requirements.

Reference 1 and the supporting as-built design reports (Reference 3) provides the evidence that the ITAAC Acceptance Criteria requirements were met:

- The ASME Code Section III design reports exist for the as-built components identified in Table 2.3.13-1 as ASME Code Section III;

- A report exists and concludes that the ASME Code Section III requirements are met for non-destructive examination of pressure boundary welds; and

- A report exists and concludes that the results of the hydrostatic test of the components identified in Table 2.3.13-1 as ASME Code Section III conform with the requirements of the ASME Code Section III.

This ITAAC required no Preservice Inspections (PSI) examinations for the Primary Sampling System (PSS), per the Unit 4 Preservice Inspection Program Plan (Reference 4).

References 1 and 3 are available for NRC inspection as part of the Unit 4 ITAAC 2.3.13.02 Completion Package (Reference 5).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings and associated corrective actions. This review, which included now consolidated ITAAC Indexes 460 and 461, found no relevant ITAAC findings associated with this ITAAC.

The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.3.13.02 (Reference 5) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.3.13.02 was performed for VEGP Unit 4 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV4-PSS-MUR-001, Rev. 0, "AP1000 Vogtle Unit 4 ASME Section III System Code Data Report for the Primary Sampling System (PSS)"

2. APP-GW-GAP-139, Rev. 9, "Westinghouse/Stone & Webster ASME Code Data Report As-Built Documentation Interface Procedure"

3. SV4-PSS-S3R-001, Rev. 0, "Vogtle Unit 4 Primary Sampling System (PSS) ASME III As-Built Piping System Design Report"

4. SV4-GW-GEI-100, Rev. 2, "AP1000 Preservice Inspection Program Plan for Vogtle Unit 4"

5. 2.3.13.02-U4-CP-Rev0, ITAAC Completion Package

Attachment A

SYSTEM: Primary Sampling System (PSS)

Equipment Name *	Tag No. *	ASME Code Section III*	ASME III As-Built Design Report	N-5 Report
Containment Air Sample Containment Isolation Valve Inside Reactor Containment (IRC)	PSS-PL-V008	Yes	SV4-PSS-S3R-001	SV4-PSS-MUR-001
Liquid Sample Line Containment Isolation Valve IRC	PSS-PL-V010A	Yes	SV4-PSS-S3R-001	SV4-PSS-MUR-001
Liquid Sample Line Containment Isolation Valve IRC	PSS-PL-V010B	Yes	SV4-PSS-S3R-001	SV4-PSS-MUR-001
Liquid Sample Line Containment Isolation Valve Outside Reactor Containment (ORC)	PSS-PL-V011A	Yes	SV4-PSS-S3R-001	SV4-PSS-MUR-001
Liquid Sample Line Containment Isolation Valve ORC	PSS-PL-V011B	Yes	SV4-PSS-S3R-001	SV4-PSS-MUR-001
Sample Return Line Containment Isolation Valve ORC	PSS-PL-V023	Yes	SV4-PSS-S3R-001	SV4-PSS-MUR-001
Sample Return Containment Isolation Valve IRC	PSS-PL-V024	Yes	SV4-PSS-S3R-001	SV4-PSS-MUR-001
Air Sample Line Containment Isolation Valve ORC	PSS-PL-V046	Yes	SV4-PSS-S3R-001	SV4-PSS-MUR-001

*Excerpts from COL Appendix C Table 2.3.13-1